

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.

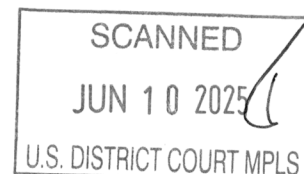
UNITED STATES OF AMERICA,	)	
	)	CR 25-227 LMP
Plaintiff,	)	<b>INFORMATION</b>
v.	)	
	)	18 U.S.C. § 371
LORRAINE LEE COMBS,	)	52 U.S.C. § 20511(2)(A)
	)	
Defendant.	)	
	)	

THE UNITED STATES CHARGES THAT:

**INTRODUCTION**

At all times material to this Information:

1. Foundation 1 was an entity seeking to register voters in the State of Minnesota.
2. Individual 1 worked as a paid contractor assisting Foundation 1 with this voter registration campaign.
3. Individual 1 was the long-time romantic partner of the defendant, LORRAINE COMBS.



**COUNT ONE**  
(Conspiracy)

**THE CONSPIRACY TO ENGAGE IN VOTER REGISTRATION FRAUD**

4. Beginning in or about 2021 and continuing until in or about 2022, in the District of Minnesota and elsewhere, the defendant,

**LORRAINE COMBS,**

and Individual 1 did knowingly and willfully combine, conspire, and agree together and with each other to knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of Minnesota of a fair and impartially conducted election process, in an election for federal office, by procuring and submitting voter registration applications that they knew to be materially false, fictitious, and fraudulent under Minnesota law to various county election offices in the State of Minnesota, all in violation of Title 52, United States Code, Section 20511(2)(A).

**MANNER AND MEANS OF THE CONSPIRACY**

5. It was part of the conspiracy that

a. COMBS and Individual 1 would generate fictitious names, addresses, dates of birth, telephone numbers, and social security numbers.

b. COMBS and Individual 1 would then fill out voter registration applications with this false information.

c. COMBS or Individual 1 would then sign a form certifying that they “have read and understand this statement” and “that giving false information is a felony punishable by not more than 5 years imprisonment or a fine of not more than \$10,000, or both.”

d. Individual 1 would then provide the completed forms to Foundation 1, through its agents.

e. Foundation 1, through its agents, would submit these false voter registration applications to county election offices across the State of Minnesota.

f. Foundation 1 would in turn pay Individual 1.

g. Individual 1 would then split the proceeds with COMBS.

### **OVERT ACTS**

6. To effect the object of the conspiracy, COMBS and Individual 1 committed and caused to be committed the following overt acts, among others, in the District of Minnesota and elsewhere:

a. On or about September 30, 2022, COMBS completed a false voter registration application in the name of “Brad Montly.”

b. On or about November 1, 2022, Individual 1 completed a false voter registration application in the name of “Harry Jhonson.”

7. All in violation of Title 18, United States Code, Section 371.

Dated: June 10, 2025

JOSEPH H. THOMPSON  
Acting United States Attorney  
District of Minnesota

By: /s/ Harry Jacobs  
Harry Jacobs  
Assistant United States Attorney  
300 South Fourth St., Suite 600  
Minneapolis, MN 55415  
Tel: 612-664-5787  
Email: Harry.Jacobs@usdoj.gov

EDWARD P. SULLIVAN  
Acting Chief, Public Integrity Section  
U.S. Department of Justice

By: /s/ Jonathan E. Jacobson  
Jonathan E. Jacobson  
Trial Attorney  
Public Integrity Section  
1301 New York Ave. NW, 10th Fl.  
Washington, DC 20005  
Tel: 202-514-1412  
Email: jonathan.Jacobson@usdoj.gov